



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590

SEP 28 2004

REPLY TO THE ATTENTION OF:

Tim J. Renner
Senior Environmental Engineer
Delphi Automotive Systems
8750 Hague Road
Indianapolis, Indiana 46256

DW-8J

RE: Approval with Conditions EI 725 Report
Delphi Automotive Systems
Flint, Michigan Facility
MID 005 356 647

Dear Mr. Renner:

The United States Environmental Protection Agency (U.S. EPA) received and reviewed your responses to our June 4, 2004, comments on your Environmental Indicator (EI) Report for Human Health (CA 725), dated December 15, 2003. The U.S. EPA will be approving the EI Report and form for Human Health (CA 725) with conditions.

Our previous comment in regards to the subtraction of site-specific background levels from detected soil concentrations for inorganics in Question #2 on the EI CA 725 form has not been completely resolved by your response. Screening procedures should still be done by comparing chemical concentrations that include both contaminant and background concentrations to risk based screening levels. The concern is that Areas of Interest (AOI's) may be eliminated from further consideration as a result of screening, when these AOI's should be carried through and further evaluated in Questions #3 and #4 of the EI form. The following condition will provide a solution and still provide us with the necessary information on all AOI's where there might be exposure issues:

- If Delphi Automotive Systems, Wyoming Facility, subtracts out background for inorganics at AOI's in Question #2 (prior to risk based screening);
- Then Delphi Automotive Systems, Wyoming Facility, will be required to provide us with a list of all AOI's where this subtraction of background was the driver for elimination of the AOI in Question #2 from further consideration in Questions #3 and #4; and

- If there are AOI's where this subtraction resulted in elimination of a specific AOI in Question #2, that we may require additional exposure information in order to make a determination on whether that AOI is an exposure concern.

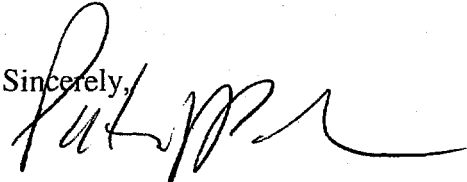
In regards to the institutional controls in place for any construction activity in AOI 48 and AOI 50 areas, we are still unsure what "due care" procedures are in place. Does this mean that a change in construction worker scenario would result in reevaluation of risk? We would like to make sure that any short or long term construction projects do not pose an unacceptable direct contact exposure risk to workers who might contact groundwater during excavation activities.

The comments that highlight our policy on evaluating indoor air using appropriate health based screening levels for environmental indicator purposes and for site remedial decisions beyond the EI determinations has not changed.

The CA 725 Environmental Indicators Form for Human Health will be finalized based on the EI Report for Human Health dated December 15, 2003; U.S. EPA's comments dated June 4, 2004; and Delphi's Response to U.S. EPA's comments dated August 27, 2004. Once the EI form is officially approved, signed, and dated a copy will be sent to you for your records.

If you have any questions, please do not hesitate to contact me at 312-886-8093.

Sincerely,



Patricia J. Polston
Corrective Action Project Manager

cc: C. Olsberg, U.S. EPA, WMB
D. Dailey, MDEQ
A. Putney, Delphi (Flint)
R. Wilhem, Haley & Aldrich
L. Ross, Haley & Aldrich